

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA  
(PHILADELPHIA)**

IN RE:

Tatyna Petrosov

Debtor(s).

CHAPTER 13

CASE NO.: 19-16061-amc

**NOTICE OF ENTRY OF APPEARANCE  
AND DEMAND FOR NOTICES AND PAPERS**

PLEASE TAKE NOTICE that NewRez LLC dba Shellpoint Mortgage Servicing as servicer for MEB Loan Trust III (“Movant”), secured creditor to the above entitled Debtors by and through its undersigned counsel, hereby enters its appearance pursuant to Bankruptcy Rule 9010(b); and such counsel hereby requests, pursuant to Bankruptcy Rules 2002, 3007 and 9007 and Section 342 of the Bankruptcy Code, that copies of all notices and pleadings given of filed in the above-captioned case be given and served upon the undersigned at the following addresses and telephone/facsimile numbers:

Angela C. Pattison, Esq,  
Hill Wallack LLP  
1415 Route 70 East, Suite 309  
Cherry Hill, NJ 08034  
Telephone: 856-616-8086  
Facsimile: 856-616-8081  
Email: [apattison@hillwallack.com](mailto:apattison@hillwallack.com)

PLEASE TAKE FURTHER NOTICE that neither this Notice of Entry of Appearance nor any subsequent appearance, pleading, claim, or suit is intended or shall be deemed to waive NewRez LLC dba Shellpoint Mortgage Servicing as servicer for MEB Loan Trust III (i) right to

have final orders in non-core matters entered only after de novo review by a higher court; (ii) right to trial by jury in any proceeding so triable herein or in any case, controversy or proceeding related hereto; (iii) right to have the reference withdrawn in any matter subject to mandatory or discretionary withdrawal; or (iv) other rights, claims, actions, defenses, setoffs, or recoupments to which NewRez LLC dba Shellpoint Mortgage Servicing as servicer for MEB Loan Trust III is or may be entitled under agreements, in law, or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved.

Dated: August 8, 2024

Hill Wallack LLP

By: /s/ Angela C. Pattison

Angela C. Pattison, Esq.

Hill Wallack LLP

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Counsel to NewRez LLC dba Shellpoint  
Mortgage Servicing as servicer for MEB  
Loan Trust III

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**CERTIFICATE OF SERVICE**

I hereby certify that service was made upon all interested parties, indicated below of (i) Notice of Appearance for NewRez LLC dba Shellpoint Mortgage Servicing as servicer for MEB Loan Trust III in the manner indicated below on August 8, 2024:

Tatyna Petrosov  
751 Magee Avenue  
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**DEBTOR - VIA REGULAR MAIL**

BRADLY E ALLEN  
Law Offices of Bradley Allen  
7711 Castor Avenue  
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**COUNSEL FOR DEBTOR - VIA ECF**

United States Trustee  
Office of the U.S. Trustee  
Robert N.C. Nix Federal Building  
Suite 320  
Philadelphia, PA 19107  
**UNITED STATES TRUSTEE - VIA ECF**

SCOTT F. WATERMAN  
2901 St. Lawrence Ave.  
Suite 100  
Reading, PA 19606  
**TRUSTEE - VIA ECF**

By: /s/ Angela C. Pattison  
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